

From: "Novak, Madi"  
To: "Eron Dodak" <edodak@integral-corp.com>  
"Michael PINTO" <michael.pinto@total.com>  
CC: "Peterson, Lance" <PetersonLE@cdmsmith.com>  
Date: 3/23/2021 12:28:45 PM  
Subject: RE: Arkema Project Area: Pre-Design Investigation Work Plan - Revisions 3/10/2021  
Attachments: [QAPP signature page from Arkema PDI Work Plan\\_rev\\_2021-03-10.pdf](#)

---

Hi Mike and Eron,

Thank you for joining me on a quick call yesterday evening. As we discussed, LSS elected to address comments pertaining to the FSP and QAPP in EPA's January 28, 2021 conditional approval. The modifications are overall responsive. However, note that the conditional approval comments still apply (for the non-FSP and QAPP comments) and the following items require clarification.

1. For FSP Section 4.4.1.3, please note that that Gasco NAPL screening protocols can be utilized for the Arkema Project Area but the Gasco site-specific PTW-NAPL definition is not applicable. The site-specific PTW-NAPL definition is based on the definition of substantial product in the Gasco SOW (CERCLA Docket No. 10-2009-0255) that pre-dates the ROD. Additionally, the Gasco SOW discussion on substantial product also states that: "As noted above, the term "substantial" product is intended to 1) target product that is related to potential future mobility and 2) indicate a preference for removal as defined by RAO #1." The Gasco SOW RAO #1 states that: "Removal of sediments containing substantial amounts of product (e.g., solid "tar" and/or NAPL) that may serve as potential future source of risk material, unless it can be shown that the costs of such removal are clearly disproportionate to the degree of risk reduction to be attained through physical removal as compared to other remedial options for the same material." This RAO indicates a preference to remove solid "tar" and/or NAPL which is not acknowledged in the text added to the Arkema PDIWP/FSP. The Gasco-specific PTW-NAPL definition should not be referenced with regard to the Arkema Project Area and the PTW discussion in the ROD (ROD Section 13) should be referenced instead. Additionally, EPA expects that visual observations of non-mobile product, if any, will be recorded in field logs even though it may not be considered to be NAPL based on the Gasco NAPL screening protocol.
2. LSS should review QAPP Tables B-5 and B-6 against the ROD Errata #2 (see: <https://semspub.epa.gov/work/10/100200076.pdf>) to ensure the correct project action limits (PALs) are referenced. In addition, both MDLs and LOQs need to be below PALs per EPA QAPP Specific Comment 10. This is not the case for all D/Fs with CULs, dieldrin, and tetrachloroethene for solid samples and DDD, DDE, DDT, pentachlorophenol, arsenic, cadmium, lead, Benzo[a]anthracene, Benzo[a]pyrene, Benzo[b]fluoranthene, Benzo[k]fluoranthene, Chrysene, Dibenz[a,h]anthracene, Indeno[1,2,3-cd]pyrene, 2,3,7,8-TCDD, Diesel Range Organics, cyanide, and tetrachloroethene for water samples. LSS should work with the contract laboratory to identify a different analytical method that is capable of achieving MDLs and LOQs below PALs or contact laboratories that are capable of achieving quantitation limits below PALs.
3. Please collect the additional signatures on the QAPP signature page and I'll sign as well. A signature from the EPA Project QA manager is not necessary; this line may be removed or left blank.

Please let me know if you have any questions.

Thank you,  
Madi

Madi Novak, Remedial Project Manager  
EPA Region 10, Superfund & Emergency Management Division  
Oregon Operations Office  
503-326-3277 (O)

(b) (6) (C)

She/Her/Hers

---

**From:** Eron Dodak <edodak@integral-corp.com>

**Sent:** Thursday, March 11, 2021 8:49 AM

**To:** Novak, Madi <Novak.Elisabeth@epa.gov>

**Cc:** Michael PINTO <michael.pinto@total.com>; Karen TRAEGER <karen.traeger@external.total.com>; dlivermore@integral-corp.com; rwebb@dofnw.com; ngray@dofnw.com

**Subject:** Arkema Project Area: Pre-Design Investigation Work Plan - Revisions 3/10/2021

Hi Madi,

On behalf of LSS, agent for Arkema Inc., below is a link to download an electronic copy of the pre-design investigation (PDI) work plan for the Arkema Project Area. This work plan is being submitted in accordance with Section 3.1(a) of the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054).

The ShareFile Links below include the following:

- Compiled PDF of the work plan text, tables, figures, and appendices that can be downloaded to your computer.
  - The changes from the December 18, 2020 version are limited to the following:
    - Title Page (added "Revised March 10, 2021" below the December 18, 2020 date to avoid confusion with the December 18, 2020 version)
    - Figures 3-4 and 3-5 (added dioxin and furan analyses for selected groundwater/porewater samples)
    - Appendix A - FSP
    - Appendix B - QAPP
  - Please note that this work plan is tagged to the extent feasible. Materials received from third party sources in the appendices may not be fully tagged.
- PDFs of the redline/strikeout versions of the FSP and QAPP text that were modified to address the EPA team's comments.

Please let me or Mike Pinto know if you have any questions about this submittal. Thanks!

**PDI Work Plan**

<https://integral-corp.> (b) (6)

**Redline/Strikeout Text (FSP and QAPP)**

<https://integral-corp.> (b) (6)

**ERON DODAK**

Tel: 503.943.3614 | Cell: (b) (6)

**INTEGRAL CONSULTING INC.**